

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant : Boal  
Serial No. : 09/451,160  
Filed : November 30, 1999  
Title : ELECTRONIC COUPON DISTRIBUTION SYSTEM

Art Unit : 3622  
Examiner : Arthur Duran  
Conf. No. : 8692

**Mail Stop Appeal Brief - Patents**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

BRIEF ON APPEAL

In accordance with appellant's Notice of Appeal filed February 21, 2007, appellant submits this Appeal Brief.

**(1) Real Party in Interest**

The case is assigned of record to Coupons, Inc., a corporation of Mountain View, California, is the real party in interest.

**(2) Related Appeals and Interferences**

There are no related appeal or interferences.

**(3) Status of Claims**

Claims 1-18 and 22-50 are pending and rejected, with claims 24, 26 and 44 being independent. Applicant appeals the rejection of claims 1-18 and 22-50.

**(4) Status of Amendments**

The claims have not been amended subsequent to final rejection. There are no unentered amendments.

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**(5) Summary of Claimed Subject Matter**

**Claim 24**

<b>Claim Language</b>	<b>Support in Specification and/or FIGS.</b>
A method of secure electronic coupon distribution comprising the steps of:	<i>See, e.g.</i> , FIG. 1.
receiving a coupon from a server;	<i>See, e.g.</i> , 8:16-19; FIG. 1, Nos. 48 and 12.
associating a Uniform Resource Locator (URL) with the coupon, the URL containing a promotional code;	<i>See, e.g.</i> , 8:16-19; 16:20-26; and 17:8-36
invoking use of the URL with a browser to thereby enable a user to redeem the coupon; and,	<i>See, e.g.</i> , 37:25-31; 38:7-13; and 38-16-21.
disabling future use of the invoked URL.	<i>See, e.g.</i> , 17:21-22; and 41:1-8.

**Claim 26**

<b>Claim Language</b>	<b>Support in Specification and/or FIGS.</b>
A method of operating an electronic coupon distribution system comprising the steps of:	<i>See, e.g.</i> , FIG. 1.
receiving a coupon request;	<i>See, e.g.</i> , 7:13-15; and 9:2-4;
collecting device information from a client system, the device information being insufficient to specifically identify a user of the client system;	<i>See, e.g.</i> , 9:36-10:9; and 10:26-30.
associating a device ID with the device information at a main server system, the device ID being insufficient to specifically identify the user;	<i>See, e.g.</i> , 10:9-15 and 10:19-23; and FIG. 1. Nos. 30 and 12.
selecting a coupon according to the device ID to thereby identify the coupon appropriate for said user based on the device information; and	<i>See, e.g.</i> , 10:15-18.

transmitting the selected coupon from the main server system to the client system.	<i>See, e.g.</i> , FIG. 1, No. 16.
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**Claim 44**

<b>Claim Language</b>	<b>Support in Specification and/or FIGS.</b>
A coupon distribution system, comprising:	<i>See, e.g.</i> , FIG. 1.
means for receiving a coupon request;	<i>See, e.g.</i> , 7:13-15; 9:2-4; and FIG. 1, No. 22 (e.g., handler 2 handles coupon requests from client database system 14).
means for collecting device information from a user of a client system indicative of one or more demographic characteristics of the user, the device information being insufficient to specifically identify the user;	<i>See, e.g.</i> , 9:36-10:9; 10:26-30; and 20:13-18 (e.g., UserInfo Object); and FIG. 1, Nos. 20, 28, 30, and 12 (e.g., client application 28 can be configured to collect user information, including preferences, and communicate with main database system 12 through the network 16).
means for associating a device ID with the device information at a main server system, the device ID being insufficient to specifically identify the user;	<i>See, e.g.</i> , 10:9-15 and 10:19-23; and FIG. 1. Nos. 12, 30 (e.g., user ID 30 may comprise a multi-digit number that is assigned by main server system 12, more particularly, database server 24 when a user registers with coupon distribution system 10).
means for selecting coupons according to the device ID to thereby identify coupons appropriate for the user based on the user's demographic characteristics; and,	<i>See, e.g.</i> , 10:15-18; and FIG. 1, No. 12 (e.g., User information is provided to the main database system 12 in the selection of coupons appropriate for the user (e.g., geographic area). Coupons from merchants located geographically proximate to the user's residence may be conveniently redeemed by the user).
means for transmitting the selected coupons from the main server system to the client system.	<i>See, e.g.</i> , 9:34-10:4; and FIG. 1, Nos. 12, 18 and 28 (e.g., client application 28 provides an interface (as provided by client software downloaded through website server 18) for a user for browsing through, and selecting coupons for printout).

**(6) Grounds of Rejection To Be Reviewed on Appeal**

Claims 24 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over **Linden** (“Linden”, U.S. Patent No. 6,360,254) in view of **Barnett** (“Barnett”, U.S. Patent No. 6,321,208).

Claims 1-18, 22, 23, 47, and 48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over **Linden** in view of **Barnett** and in view of **Lang** (“Lang”, U.S. Patent Application Publication No. 2003/0083931).

Claims 26-46 and 49-50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over **Lang** in view of **Barnett**.

**(7) Arguments**

**I. Section 103(a) Rejection**

Claim 24

Claim 24 stands rejected as unpatentable over Linden in view of Barnett.

**a. Linden’s Gift Certificate Is Not The Same As Applicant’s Claimed Coupon**

Claim 24 recites in part receiving a coupon from a server. The Examiner has asserted that the gift certificate shown in FIG. 10 of Linden is equivalent to Applicant’s claimed coupon. Applicant respectfully submits that a gift certificate is not the same as a coupon. A gift certificate is a convenient form of entitlement that allows a bearer to select and purchase a product (or service) up to a specified value as set forth in the gift certificate. The certificate represents a completed transaction, in that typically the gift certificate is bartered for and then subsequently redeemed by the purchasing party or another entity (i.e., hence the name “gift” certificate). In essence, a gift certificate is a form of money.

By contrast, a coupon is a document that entitles a bearer to a discount or other compensation in the event that a future transaction is completed in accordance with the terms associated with the coupon. The discount (e.g., a discount percentage, fixed price reduction) or other compensation (e.g., receipt of a second similar item, receipt of a different item, etc.) is one term of the terms specified in the coupon. Other terms include other requirements that set forth the nature of the transaction and the associated compensation that will be provided to the

purchaser in the event that the specified transaction is completed. A coupon is not itself a negotiable instrument, as evidenced often by the phrase "no cash value" that can be found on many popular forms of coupons. For at least these reasons, Applicant respectfully submits that the gift certificate shown in FIG. 10 of Linden is not equivalent to Applicant's claimed coupon.

**b. Linden Does Not Teach Or Suggest "receiving a coupon from a server"**

As an initial matter, in rejecting claim 24, Applicant respectfully asserts that the Examiner has read into the claim a limitation that is not present. Specifically, the Examiner has suggested that claim 24 includes a "coupon request" [see, page 3, line 20-23 of Final Office Action mailed October 4, 2006]. Claim 24 recites no such limitation. Applicant respectfully asserts that the Examiner has failed to provide any indication where in the Linden reference Applicant's claimed "receiving a coupon" limitation is taught or suggested. For at least this reason, Applicant respectfully submits that claim 24 is allowable.

**c. Linden Does Not Teach Or Suggest a URL With A Promotional Code**

Claim 24 requires not only associating a URL with a coupon, but also requires associating a URL with a coupon where the URL contains a **promotional code**.

In the "Response to Arguments" section of the pending Office Action, the Examiner has asserted that "Applicant's claims state minimal specific features as to the characteristics of the promotional code contained in the URL" and "the promotional code in the URL is open to a broad interpretation" (page 13, 4<sup>th</sup> ¶ of Final Office Action mailed October 4, 2006). Citing FIG. 3a, FIG. 9, and claim 29 of Linden. The Examiner further asserts that "the specific promotional code that identifies the specific promotion or specific coupon/promotion amount is included in the URL" of Linden (page 14, 1<sup>st</sup> ¶ of Final Office Action mailed October 4, 2006). Applicant respectfully disagrees.

Assuming for the sake of argument (a point Applicant does not concede) that a gift certificate is the same as a coupon, Linden discloses a system in which a user can access a private resource (i.e., the gift certificate in the form of a web page or data record) with an automatically generated private URL that includes a fixed character string and a unique token (1:56-58). A server application 40 generates and transmits to the user an email document 72

which includes a hyperlink 74 to the private URL (7:11-13). To generate the hyperlink 74, server application 40 invokes a token generation code 50 to generate a token that uniquely corresponds to the user's private data record 46 (7:15-18). The token includes fixed-length, numeric, alphanumeric or non-alphanumeric characters (3:58-61), and is combined with a fixed character string to form the private URL that is incorporated into the email document 72 within the hypertext reference portion of the hyperlink 74 (7:18-22). When a user requests access to a private resource, the token embedded in the hyperlink 74 is passed to the server application for validation. If the token is valid, server application 40 maps the token to the corresponding data record 46, and returns the data record 46 to the user (7:30-42).

As shown in the figure below (also shown in FIG. 10 of Linden), the private URL embedded in the hyperlink 74 and referencing a corresponding web page 78 containing information associated with a gift certificate has the form:

Address	<a href="http://amazon.com/gc/redeem/A9HBJIE55GOML">http://amazon.com/gc/redeem/A9HBJIE55GOML</a>	▼
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where the character string "A9HBJIE55GOML" is the token (3:61-4:2). The token "A9HBJIE55GOML" identifies a particular private resource, such as by identifying a particular user, user group, file or database account (4:3-5). To generate the token, the user's email address is initially converted into a 36-bit email ID to be combined with a time stamp to establish a 64-bit integer value (8:25-31). The 64-bit value is then encrypted to generate a 64-bit token value . . . to be used as the token in the private URL (8:42-48).

Claim 24 recites a "promotional code" contained in a URL, while Linden describes a "token value." The relied upon portions (i.e., FIG. 3a, FIG. 9, and claim 29) of Linden do not teach that the token value is a promotional code. A promotional code identifies a promotion, and Linden's token value is a code that identifies a particular private resource. A private resource is **not** the same as a promotion. More specifically, a private resource identifies a web page associated with or data record corresponding to a particular user. Accordingly, the private resource is identified using, for example, the **user's email address** and a **time stamp** representing a current date and time (i.e., in the form of a token). The token does **not** identify a promotion. The token identifies a web page, which Applicant concedes can include any form of content. However, Applicant respectfully asserts that Linden's token that includes an email

address and time stamp, etc., is not a promotional code. While the hyperlink 74 shown in FIG. 9 of Linden provides a URL to a gift certificate referenced in FIG. 10, the URL does not include a code that identifies a promotion (e.g., a buy-one-get-one-free voucher, \$2.00 off coupon or free shipping offer, etc.)

**d. Barnett Does Not Teach Or Suggest Applicant's Claimed Limitations**

In further rejecting claim 24, the Examiner purports to rely on Barnett to disclose but a single limitation (see page 3, line 22 indicating Barnett discloses "a coupon request"). As indicated above, Applicant respectfully asserts that the Examiner has read into the claim a limitation that is not present. Specifically, the Examiner has suggested that claim 24 includes a "coupon request" [see, page 3, line 22 of Final Office Action mailed October 4, 2006]. As discussed above, claim 24 recites no such limitation. Further, Applicant respectfully asserts that the Examiner has failed to provide any indication where in the Barnett reference Applicant's claimed "receiving a coupon" limitation is taught or suggested. For at least this reason, Applicant respectfully submits that claim 24 is allowable.

For at least these reasons, Applicant respectfully submits that claim 24 is allowable over Linden and Barnett, alone or in combination.

**II. Section 103(a) Rejection**

Claim 26

Claim 26 stands rejected as allegedly being unpatentable over Lang in view of Barnett.

**a. Lang and Barnett Do Not Disclose Or Suggest Device Information Being Insufficient To Specifically Identify A User**

Claim 26 recites in part collecting device information from a client system, the device information being insufficient to specifically identify a user of the client system.

Lang describes a method of marketing that enables advertisers to more specifically target their advertising to users or their electronic devices according to web sites or files previously visited on a wide area network (WAN) (§§ 0001). Lang first identifies the electronic devices connected to the WAN (§§ 0014), obtains physical locations of these electronic devices (§§

0015), and stores information regarding web sites or files visited over the WAN by users of the electronic devices (§§ 0016). All of these information are collected by a database generator to create user files for determining users to be targeted for a particular advertisement.

In the "Response to Arguments" section of the Office Action, the Examiner asserts that "the device [of Lang] is tracked and then information about a user is inferred based upon the activity of the device" (page 15, lines 3-4 of Final Office Action mailed October 4, 2006). The Examiner further asserts that while "the information of the electronic device is necessarily obtained and tracked[,] . . . the user name or personal information is additional or optional information" (page 15, lines 2-3 of Final Office Action mailed October 4, 2006). Therefore, the Examiner concludes that "Lang discloses that just the device is tracked such that the user information can be inferred, however, the actual user is not necessarily known" (page 15, lines 5-6 of Final Office Action mailed October 4, 2006).

At (§§ 0017), Lang discloses that in each delivery scheme, the advertisements transmitted to the targeted users are based on: 1) electronic device's ID information; 2) the electronic device's or user's network activities on the WAN; and 3) the past, present or future physical location of the electronic device or user when connected to the WAN (§§ 0017). As will be discussed below, personal information sufficient to identify a user is required in order to retrieve each of these information.

First, Lang shows that an electronic device's ID information is assigned to a laptop 15 of a user upon the establishment of an account on the central server 50. Initially a client software program 22 supplied by the operator of the central server 50 must be loaded into the laptop 15. The user's personal information is then entered into the client software program 22 by the user 10 (§§ 0024). Such personal information includes "name, physical address and email address" (§§ 0031). In response, the central server 50 issues an electronic device's ID information to the laptop 15, and the laptop 15 connected to the WAN 8 is subsequently identified based on this electronic device's ID information (§§ 0024).

Accordingly, the user is required to submit personal information to the central server 50 in order to establish an account. The electronic device's ID information is assigned to the laptop 15 once a user's personal information, which identifies the user, is entered into client software program 22. Applicant respectfully asserts that there is no suggestion that the submission of



such personal information is in any way optional, or that an account can be granted without the submission of personal information or identification of the user to the central server 50.

In a second operational mode, Lang describes that network activity information 53 regarding web sites or files visited by the user of the laptop 15 over the WAN 8 can be compiled. Such network activity information 53 may be obtained from the client software program 22 initially used to **log on** to the central server 50. Information regarding the web sites visited by the user 10 using the laptop 15 may also be obtained by reviewing "cookies" stored on the laptop 15 when connected to the central server 50 (¶¶ 0025). The log on process also requires the user to have an account established on the central server 50, and this account, as discussed above, **requires the submission of user's personal information**, such as **name**, **physical address** and **email address**, that identifies the user. There is no disclosure in Lang that supports that the network activity information 53 can be obtained without having an account or personal information of the user on the central server 50.

In a third mode of operation, Lang describes that each time the user uses the laptop 15 to connect to the central server 50, the past and present physical location information 54 of the laptop 15 connected to the WAN 8 is automatically downloaded to the central server 50 (¶¶ 0024). For example, when a user initially enters his automobile and starts his laptop computer, the laptop computer automatically connects to the Internet using the wireless internet service provider (ISP). Since the user has previously set up his account on the ISP, the central server immediately knows the user's ID information and begins to receive real time location information via the GPS receiver connected to the user's laptop computer (¶¶ 0024). Simply put, Lang tracks the exact physical location of the user using GPS satellites, "twenty-four hours per day, anywhere in the world" (¶¶ 0023). This tracking is performed upon verification of the user's account on the ISP. Applicant respectfully asserts that the ISP necessarily uses user's personal information (e.g., address where the service is to be provided, credit card or bank account number to which the service will be billed, etc) that identifies the user to establish an account prior to providing, for example, internet services. It would be inappropriate to assert that such information is "insufficient to specifically identify a user of the client system."

Further, Lang shows that real time location information is received and transmitted to the user's laptop once the user's ID information is known. [add cite here]As discussed above, this ID

information is assigned to the laptop and known to the central server 50 once a user's personal information, such as name, physical address and email address, is entered into client software program 22. There is no disclosure in Lang that provides that the laptop can be tracked using such ID information without the submission of user's personal information.

Barnett fails to remedy the deficiencies of Lang, as Barnett teaches that users' social security numbers (which specifically identify the users) should be bar-coded onto every coupon the users print. Thus, for at least the foregoing reasons, Lang and Barnett fail to teach "collecting device information insufficient to specifically identify a user".

**b. Lang and Barnett Do Not Disclose Or Suggest Receiving A Coupon Request, Selecting A Coupon And Transmitting The Selected Coupon**

Independent Claim 26 also recites in part receiving a coupon request, selecting a coupon and transmitting the selected coupon.

As noted on page 9, lines 18-20 of Final Office Action mailed October 4, 2006, the Examiner concedes that Lang does not disclose a coupon or a coupon request, but asserts that "coupons" are implicit based on the disclosure of "marketing, advertising and promotions".

Applicant respectfully submits that Lang does not teach or suggest a "coupon," as asserted by the Examiner, and further submits that the Examiner's reasoning that "coupons" are implicit in Lang's purported disclosure of "marketing, advertising, and promotions" is not accurate.

Each of these terms—marketing, advertising, and promotions—describes a very large field, or genus. Federal Circuit law holds that a disclosure of a large genus does not anticipate a claim for a species. The Federal Circuit held in *Corning Glass Works v. Sumitomo Electric U.S.A.*, 868 F.2d 1251, 1262 (Fed. Cir. 1989), rejected the theory that "a claim to a genus would inherently disclose all species." The court explained, "[The publication] is a reference only for that which it teaches." In *Minnesota Mining & Manufacturing v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 1572 (Fed. Cir. 1992), the court held that "although [a patent's] specific claims are subsumed in [a prior art reference's] generalized disclosure ..., this is not literal identity." The reference's ranges were "so broad as to be meaningless" and provided no guidance on how to construct a product with the patent's beneficial properties.

Therefore, even if any of the terms “marketing, advertising, and promotions” could be properly read to subsume the term “coupon,” there is nothing in Lang’s usage of the words “marketing,” “advertising,” and “promotions” which might suggest receiving a coupon request, selecting a coupon and transmitting the selected coupon, as required by claim 26.

For example, Lang does not use the word “promotions” at all. The word “promote” does occur, once, in the background paragraph (¶ 0003). The word “promote” does not occur at all in the description of the invention. The sentence where it occurs says nothing about receiving a coupon request, selecting a coupon and transmitting the selected coupon, or for that matter, receiving, selecting and transmitting anything else. The sentence reads:

“More particularly, this invention relates to a method of marketing wherein an advertiser desiring to promote its goods or services to a targeted group of consumers who use a computer linked to a wide area network.”

Similarly, Lang never refers to “promotions” (a noun) at all. Thus, even if a coupon were a kind of promotion, Lang would not disclose transmitting coupons through the word “promotion.”

As another example, Lang discloses but a single “method of marketing.” (e.g., ¶ 0021) (“Referring to FIGS. 1-3, there is shown a method of marketing...”). There is no disclosure in Lang that this single disclosed method of marketing includes receiving a coupon request, selecting a coupon and transmitting the selected coupon.

Similar to the rejection to claim 24, the Examiner purports to rely on Barnett to disclose but a single limitation (see page 3, line 22 indicating Barnett discloses “a coupon request”). As indicated above, Applicant respectfully asserts that the Examiner has read into the claim a limitation that is not present. Specifically, the Examiner has suggested that claim 26 includes a “coupon request”. As discussed above, claim 24 recites no such limitation. Further, Applicant respectfully asserts that the Examiner has failed to provide any indication where in the Barnett reference Applicant’s claimed “receiving a coupon” limitation is taught or suggested. For at least this reason, Applicant respectfully submits that claim 26 is allowable.

### **The Reliance On The Term “May”**

As noted in the “Response to Arguments” section in the Final Office Action mailed October 4, 2006, the Examiner evidently relies upon Lang’s usage of the word “may” to mean

that Lang purportedly teaches an invention which operates in the absence of personally identifiable information (Lang writes, “The actual name of the user may be used and added to the user file,” and, “Other personal information ... may also be collected and added to the user file.” ¶ 0017) (page 14, lines 9-16 of Final Office Action mailed October 4, 2006).

This argument fails because Lang teaches that one object of the invention is to allow advertisers to track the web sites and files visited by customers on the Internet, and that a second object of the invention is to allow advertisers to track the “past, present, and future physical locations of their customers,” such as by GPS (global positioning system) satellites (¶¶ 0011-12, 0015). As the collection of this highly personal information is the “object of the invention,” there is no suggestion in the relied upon part of Lang that the collection of this information is in any way optional. Thus, the teachings of Lang fail to meet the claim limitation that the information is “insufficient to specifically identify a user of the client system.” There are at least two reasons that Lang’s GPS information is sufficient to specifically identify users. First, Lang describes the on-going tracking by advertisers of the exact physical location of customers using GPS satellites, “twenty-four hours per day, anywhere in the world.” ¶ 0023. Second, Lang states that telephone numbers (which are indubitably sufficient to specifically identify users) are an acceptable substitute for GPS location (¶ 0023).

For at least these reasons, Applicant respectfully submits that claim 26 is allowable over Lang and Barnett, alone or in combination. Claims 27-43 and 49 depend from claim 26, and also are submitted to be allowable for the same reasons discussed with respect to claim 26.

### **III. Section 103(a) Rejection**

#### Claim 44

Claim 44 stands rejected as being unpatentable over Lang in view of Barnett. Claim 44 recites in part means for collecting device information being **insufficient** to specifically identify a user.

As discussed *supra*, neither Lang nor Barnett disclose or suggest collecting device information being insufficient to specifically identify a user, nor the means for doing so. For at least these reasons, Applicant respectfully submits that claim 44 is allowable over Linden and

Barnett, alone or in combination. Claims 45-46 and 50 depend from claim 44, and also are submitted to be allowable for the same reasons discussed with respect to claim 44.

#### **IV. Section 103(a) Rejection**

Claims 1-18, 22, 23, 47, and 48 stand rejected as being unpatentable over Linden in view of Barnett and further in view of Lang. As claims 1-18, 22, 23, 47, and 48 depend from claim 24, Applicant respectfully submits that claims 1-18, 22, 23, 47, and 48 also are submitted to be allowable for the same reasons discussed with respect to claim 24.

Further, claim 1 is allowable for at least the following additional reason. Claim 1 recites in-part collecting device information from a client system, the device information being **insufficient to specifically identify the user**, and associating a device ID with the device information at a main server system, the device ID being **insufficient to specifically identify the user**.

Linden and Barnett, alone or in combination, do not disclose the features disclosed in claim 1, as evidenced by the reliance on Lang. With respect the disclosure of Lang, as already discussed, in each delivery scheme, the advertisements transmitted to the targeted users are based on: 1) electronic device's ID information; 2) the electronic device's or user's network activities on the WAN; and 3) the past, present or future physical location of the electronic device or user when connected to the WAN (§§ 0017). Such information (i.e., device ID, network activities and physical location of electronic device), however, can only be known after receiving personal information that identifies a user by the client software program (e.g., via name, physical address and email address), so as to enable advertisers to target their advertisements to specific and selected group of users.

Therefore, claim 1 is in condition for allowance. Claims 2-18 and 48 include limitations similar to those in claim 1 and are in condition for allowance for at least the same reason.

### **Appendix of Claims**

1. The method of claim 24 further including the steps of:  
collecting device information from a client system, the device information being insufficient to specifically identify the user;  
associating a device ID with the device information at a main server system, the device ID being insufficient to specifically identify the user;  
selecting said coupon according to the device ID to thereby identify the coupon appropriate for said user based on the device information; and,  
transmitting the selected coupon from the main server system to the client system.
2. The method of claim 1 wherein the device information is obtained from the user, the device information including at least one of a postal zip code associated with the user and a state in which the user resides.
3. The method of claim 1 further including the step of:  
associating the device ID with the client system, the main server system using the device ID to identify the client system.
4. The method of claim 3 further including the step of:  
generating a printed version of the transmitted coupon at the client system.
5. The method of claim 3 further including the step of:  
transmitting a request from the client system to the main server system to perform said using step wherein the request includes the device ID.
6. The method of claim 5 wherein said request transmitting step includes the substep of:  
automatically including the device ID in the request without any intervention by the user of the client system.

7. The method of claim 5 wherein said request transmitting step occurs automatically without any intervention by the user.

8. The method of claim 7 wherein said request transmitting step occurs at predetermined intervals.

9. The method of claim 3 wherein the client system operates in accordance with an operating system characterized by a graphical user interface (GUI), said method further including the steps of:

displaying an icon visible to the user in a first display state; and,  
displaying the icon in a second display state different from the first display state when a new coupon is available for the user.

10. The method of claim 9 wherein the second display state is a flashing display state.

11. The method of claim 1 wherein said transmitting step includes the substeps of:  
encrypting coupon data corresponding to the selected coupon at the main server system in accordance with a server system encryption strategy; and,  
sending the server-encrypted coupon data to the client system.

12. The method of claim 11 further including the step of:  
receiving the server-encrypted coupon data at the client system;  
encrypting the server-encrypted coupon data in accordance with a client system encryption strategy to thereby generate doubly-encrypted coupon data; and,  
storing the doubly-encrypted coupon data on the client system.

13. The method of claim 12 further including the steps of:  
decrypting the doubly-encrypted coupon data at the client system; and,  
generating a printed version of one of the selected coupon at the client system.

14. The method of claim 3 further comprising the steps of:  
transmitting advertising data to the client system; and,  
displaying at least a portion of the transmitted advertising data on a display portion of the client system.

15. The method of claim 14 wherein the advertising data comprises a plurality of advertising impressions, and, wherein said displaying step comprises the substep of:  
selecting one of the plurality of advertising impressions as a function of a selected subcategory of coupons available on the client system.

16. The method of claim 3 further comprising the steps of:  
detecting events occurring at the client system;  
storing the detected events in a user history file; and  
transmitting the user history file to the main server system.

17. The method of claim 16 wherein said detecting step includes the substeps of:  
determining when one of a plurality of advertising impressions has been displayed on a display portion of the client system; and,  
determining a sponsor identification of the advertising impression.

18. The method of claim 16 wherein the storing step comprises the substep of:  
encrypting the detected events to thereby generate encrypted user event information; and,  
writing the encrypted user event information to the client system.

19.-21. Canceled

22. The method of claim 24 further including the steps of:  
collecting device information from a device on a network;  
associating a device ID with the device information;  
selecting said coupon according to the device ID;



encrypting coupon data corresponding to the selected coupon; and transmitting the encrypted coupon data from the main server system to the client system.

23. The method of claim 22 further including the step of:  
decrypting the encrypted coupon data to recover the selected coupon.

24. A method of secure electronic coupon distribution comprising the steps of:  
receiving a coupon from a server;  
associating a Uniform Resource Locator (URL) with the coupon, the URL containing a promotional code;  
invoking use of the URL with a browser to thereby enable a user to redeem the coupon;  
and,  
disabling future use of the invoked URL.

25. The method of claim 24 wherein said invoking step includes the substep of selecting a displayed version of the coupon by one of: clicking on the displayed version of the coupon and clicking on an object different than the displayed version of the coupon.

26. A method of operating an electronic coupon distribution system comprising the steps of:  
receiving a coupon request;  
collecting device information from a client system, the device information being insufficient to specifically identify a user of the client system;  
associating a device ID with the device information at a main server system, the device ID being insufficient to specifically identify the user;  
selecting a coupon according to the device ID to thereby identify the coupon appropriate for said user based on the device information; and  
transmitting the selected coupon from the main server system to the client system.

27. The method of claim 26 wherein the device information is obtained from the user, the device information including at least one of a postal zip code associated with the user and a state in which the user resides.

28. The method of claim 26 further including the step of:  
associating the device ID with the client system, the main server system using the device ID to identify the client system.

29. The method of claim 28 further including the step of:  
generating a printed version of one of the transmitted coupons at the client system that includes the device ID.

30. The method of claim 28 further including the step of:  
transmitting a request from the client system to the main server system to perform said using step wherein the request includes the device ID.

31. The method of claim 30 wherein said request transmitting step includes the substep of:  
automatically including the device ID in the request without any intervention by the user of the client system.

32. The method of claim 30 wherein said request transmitting step occurs automatically without any intervention by the user.

33. The method of claim 32 wherein said request transmitting step occurs at predetermined intervals.

34. The method of claim 28 wherein the client system operates in accordance with an operating system characterized by a graphical user interface (GUI), said method further including the steps of:

displaying an icon visible to the user in a first display state; and,  
displaying the icon in a second display state different from the first display state when a new coupon is available for the user.

35. The method of claim 34 wherein the second display state is a flashing display state.

36. The method of claim 26 wherein said transmitting step includes the substeps of:  
encrypting coupon data corresponding to the selected coupons at the main server system in accordance with a server system encryption strategy; and,  
sending the server-encrypted coupon data to the client system.

37. The method of claim 36 further including the step of:  
receiving the server-encrypted coupon data at the client system;  
encrypting the server-encrypted coupon data in accordance with a client system encryption strategy to thereby generate doubly-encrypted coupon data; and,  
storing the doubly-encrypted coupon data on the client system.

38. The method of claim 37 further including the steps of:  
decrypting the doubly-encrypted coupon data at the client system; and,  
generating a printed version of one of the selected coupons at the client system.

39. The method of claim 28 further comprising the steps of:  
transmitting advertising data to the client system; and,  
displaying at least a portion of the transmitted advertising data on a display portion of the client system.

40. The method of claim 39 wherein the advertising data comprises a plurality of advertising impressions, and, wherein said displaying step comprises the substep of:

selecting one of the plurality of advertising impressions as a function of a selected subcategory of coupons available on the client system.

41. The method of claim 28 further comprising the steps of:  
detecting events occurring at the client system;  
storing the detected events in a user history file; and,  
transmitting the user history file to the main server system.

42. The method of claim 41 wherein said detecting step includes the substeps of:  
determining when one of a plurality of advertising impressions has been displayed on a display portion of the client system; and,  
determining a sponsor identification of the advertising impression.

43. The method of claim 41 wherein the storing step comprises the substep of:  
encrypting the detected events to thereby generate encrypted user event information; and,  
writing the encrypted user event information to the client system.

44. A coupon distribution system, comprising:  
means for receiving a coupon request;  
means for collecting device information from a user of a client system indicative of one or more demographic characteristics of the user, the device information being insufficient to specifically identify the user;  
means for associating a device ID with the device information at a main server system, the device ID being insufficient to specifically identify the user;  
means for selecting coupons according to the device ID to thereby identify coupons appropriate for the user based on the user's demographic characteristics; and,  
means for transmitting the selected coupons from the main server system to the client system.

45. The system of claim 44 wherein said collecting means includes means for obtaining from the user demographic characteristics including at least one of a postal zip code associated with the user and a state in which the user resides.

46. The system of claim 45 further including means for associating the device ID with the client system, the main server system using the device ID to identify the client system.

47. The method of claim 24, wherein:  
the coupon is received in encrypted form;  
and the method further comprises:  
transmitting a request for the coupon; and  
storing the coupon in encrypted form on a non-volatile computer-readable medium.

48. The method of claim 4, wherein the printed version of the transmitted coupon includes a portion of the device information or all of the device information.

49. The method of claim 26, wherein the coupon is transmitted in encrypted form.

50. The system of claim 44, wherein the coupon is transmitted in encrypted form.

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### **Evidence Appendix**

None

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### **Related Proceedings Appendix**

None

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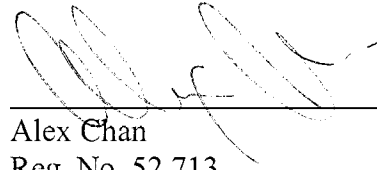
**(8) CONCLUSION AND RELIEF**

Based on the foregoing, Appellant requests that the Board overturn the Examiner's rejection of all pending claims and hold that all of the claims of the present application are allowable.

The brief fee in the amount of \$250 and a one-month Petition for Extension of Time fee of \$60 are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 5/21/07

  
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